

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BARKAT S. HOODA, M.D.,

Plaintiff,

V.

W.C.A. SERVICES CORPORATION
d/b/a WCA HOSPITAL, ET AL.,

Defendants.

WDNY DOCKET NO. 1:11-cv-00504

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to F.R.C.P. 30, the testimony of the Plaintiff, BARKAT HOODA, M.D., will be taken before a notary public, or another person authorized to administer oaths under the laws of the State of New York, at a mutually agreeable date and time at FELDMAN KIEFFER, LLP, The Dun Building, 110 Pearl Street, Buffalo, New York 14209.

That the matters upon which such person or persons are to be examined are all the relevant facts and circumstances in connection with the accident alleged in the Complaint herein, including negligence, liability and damages.

PLEASE TAKE FURTHER NOTICE, pursuant to F.R.C.P. 30 & 34, the Party to be examined is requested to produce upon said examination any and all records, memoranda and data in their possession relating to the matters upon which the examination is sought herein for the purpose of refreshing the witnesses' recollection as set forth herein:

1. Current Curriculum Vitae,
2. All documents relating to the National Practitioner Data Bank report;
3. All documents relating to the New York State Office of Professional Discipline
Action;
4. All documents relating to Plaintiff's employment with UMTB;
5. All documents demonstrating Plaintiff's damages as alleged in the Complaint;
6. All documents pertaining to Plaintiff's employment with Southern Tier Pediatrics;
7. All documents pertaining to Plaintiff's privileges at WCA Hospital in his
possession;

8. All communications between the Plaintiff and any defendant named in this action;
9. All communications between the Plaintiff and any government entity concerning the subject matter of the Complaint;
10. All application(s) for medial licenses prepared by the Plaintiff;
11. All communications concerning Plaintiff's medial license application(s);
12. All Continuing Medical Education course material attended by the Plaintiff in the past five (5) years;
13. All communication between the Plaintiff and the U.S. Department of Health and Human Services concerning the National Practitioner Data Bank report.

Dated: May 2, 2012
Buffalo, New York

FELDMAN KIEFFER, LLP

/s/ Stephen A. Manuele

By: Stephen A. Manuele
Attorneys for Defendants, WCA
HOSPITAL and BETSY WRIGHT
The Dun Building, Suite 400
110 Pearl Street
Buffalo, New York 14202
(716) 852-5875
smanuele@feldmankieffer.com

TO: W. Craft Hughes
Hughes Ellizey, LLP
2700 Post Oak Blvd, Suite 1120
Houston, TX 77056